INITIAL ASSESSMENTS AND STABILIZATION EVALUATIONS OF RCRA FACILITIES

COMMERCIAL DISPOSAL COMPANY, INC.

Submitted to:

Ms. Rosanne Sawaya-O'Brien
Regional Project Officer
Environmental Protection Agency
Region 1
Waste Management Division (HPC CAN-7)
JFK Federal Building
Boston, Massachusetts 02203

Submitted by:

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EPA Work Assignment No.:	R01015
Contract No.:	68-W4-0013
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April 14, 1995

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Commercial Disposal Company, Inc.
EPA I.D. No. MAD002791515

Facility Summary

The Commercial Disposal Company, Inc. (Commercial Disposal) is located in West Springfield, Massachusetts. The facility operated as a waste collection and storage facility for local industry. Facility operations included transporting and collecting waste from industrial clients, temporarily accumulating and storing waste in tanks and drums, and transporting waste to off-site Treatment, Storage, and Disposal (TSD) facilities. The facility operated under RCRA Interim Status as a TSD facility from 1980 to December 31, 1986. Part of the site is presently used as a truck maintenance garage by Commercial Disposal, while the remainder of the site is leased by Oil Recovery, Inc. and also used for truck maintenance (References 3, 16, 19, 24 and 30).

Commercial Disposal terminated its Interim Hazardous Waste License on December 31, 1986, and ceased operations as a hazardous waste storage facility. An inspection conducted by the Massachusetts Department of Environmental Quality Engineering (MADEQE), now the Massachusetts Department of Environmental Protection, on April 17, 1987 confirmed that no hazardous waste had been stored at the facility since December 31, 1986. The facility began RCRA closure activities in accordance with a MADEQE approved RCRA Closure Plan for the Tank Farm Area (AOC 1), the North Drum Storage Area (AOC 2), the South Drum Storage Area (AOC 3), the East Drum Storage Area (AOC 5) and the Garage Drum Storage Area (AOC 6) in April 1987 (Reference 19).

Closure of the Tank Farm Area (AOC 1) consisted of emptying, cleaning, and transporting the four tanks at the unit off-site. The soil at the Tank Farm Area was sampled and determined to be contaminated with barium, oil and grease. The soil was excavated to a depth of 1.5 feet and transported off-site as hazardous waste. Closure activities at the Tank Farm Area were completed in October 1987. Closure of the North Drum Storage Area (AOC 2), the South Drum Storage Area (AOC 3), and the Garage Drum Storage Area (AOC 6) included steam cleaning of the asphalt and concrete pads at the unit and collecting and transporting the rinseate off-site for disposal. closure activities at AOCs 2, 3 and 6 were completed in 1987. The East Drum Storage Area (AOC 5) had an earthen base. Soil sampling conducted at the unit indicated halogenated organic contamination in the upper one foot of soil. Closure included excavation of the contaminated soil and backfilling of the excavated area. Closure activities at the unit were completed in May 1993. Available references indicate that no groundwater monitoring has been required at the facility. Available references did not indicate whether the closure activities conducted at AOCs 1, 2, 3, 5 and 6 were certified by a professional engineer or certified/ approved by MADEQE and/or U.S. EPA Region 1 (References 14, 16, 19, 20, 24 and 30).

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The facility presently operates as a Conditionally Exempt Small Quantity Generator (CESQG) and has a Class A Recycling Permit (No. WR-91-2) issued by the Massachusetts Department of Environmental Protection (MADEP). The permit authorizes the facility to burn a maximum of 2,000 gallons per year of waste motor oil in a Space Heater (AOC 9) (References 25, 26, 28 and 31).

According to U.S. EPA Region 1 representatives, the site is presently listed as medium priority on the National Corrective Action Prioritization System (NCAPS). Therefore, only the first four questions of the Stabilization Evaluation Checklist were completed for the site.

Nine Areas of Concern (AOCs) were identified at Commercial Disposal. These include:

1. Tank Farm Area
2. North Drum Storage Area
3. South Drum Storage Area
4. Underground Storage Tank
5. East Drum Storage Area
6. Garage Drum Storage Area
7. Drum Loading Area
8. Former Storage Area
9. Space Heater

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AOC Number: 1

AOC Name: Tank Farm Area

AOC Status: Release has occurred

AOC Description:

The unit was located near the east boundary of the facility. It consisted of four RCRA Interim Status hazardous waste storage tanks: two 3,000 gallon capacity tanks and two 4,000 gallon capacity tanks. The two 4,000 gallon capacity tanks were considered to be underground tanks according to Massachusetts regulations. Waste oil and water soluble coolants were received in bulk via tanker trucks for storage in the tanks at the unit. The waste oil and water soluble coolants were generally stored less than ten days before being transported off-site. Available references did not indicate the construction materials of the tanks at the unit (References 2, 6, 10 and 14).

Available references indicate that between June 11, 1985 and April 17, 1987, the facility ceased operating the unit and cleaned and removed the two 4,000 capacity tanks. Oil staining on the ground beneath the two 3,000 gallon capacity tanks and on the earthen berm of the unit was noted during an April 17, 1987 MADEQE site inspection. The tanks were cleaned with petroleum-based solvent rinse, detergent wash, and water rinse using a high-pressure spray nozzle; then the tanks were transported off-site per an approved RCRA closure plan. The earthen berm and soil at the unit were excavated to a depth of 1.5 feet below surface level. The unit area was backfilled with clean fill in late 1987 per MADEQE approval (granted October 9, 1987). However, available references did not indicate whether the closure activities conducted at AOC 1 were certified by a professional engineer or certified/approved by MADEQE and/or U.S. EPA Region 1 (References 16, 19, 20, 21, 22, 23 and 24).

AOC Start-Up Date:

The unit began operation in June 1981 (Reference 14).

AOC Closure Date:

The unit ceased operation between June 11, 1985 and April 17, 1987. RCRA closure activities at the unit were completed in October 1987 (References 16, 19 and 24).

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Waste Managed at AOC:

The tanks at the unit managed industrial waste oil, crankcase oil, water soluble coolant, and oil contaminated rinses (Reference 14).

Release Controls:

The tanks at the unit were located over soil. The unit area was surrounded by an earthen berm (Reference 16).

Release History:

A release of approximately 10 to 15 gallons of waste crankcase oil occurred at one of the 3,000 gallon capacity tanks on June 7, 1985. The exterior of the tank was cleaned, and contaminated soils were reportedly removed. Stained soil was noted within the bermed area and on top of the berm during an inspection conducted by the MADEQE on April 17, 1987. As part of the RCRA closure of the unit, soil from the unit was excavated to a depth of one-foot, and six composite samples were collected from the area. The samples were analyzed for EP Toxicity (metals), Oil and Grease, Halogenated, Non-Halogenated, Aromatic Volatile Organics and PCBs. Elevated levels of barium, oil and grease (up to 770 ppm) were detected in the samples. An additional six-inches of soil were excavated from the unit and six new composite samples were analyzed for barium, oil and grease. Barium was below established background levels in all samples. Oil and grease concentrations ranged from 10 to 66 ppm. The MADEQE reported that "the residual levels of Oil and Grease are representative of background levels and do not pose a threat to the public health, safety and welfare or to the environment." All excavated soil was disposed off-site as hazardous waste (References 14, 16 and 24).

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AOC Number: 2

AOC Name: North Drum Storage Area

AOC Status: Low potential for release

AOC Description:

The unit was located near the north corner of the facility adjacent to Bay 5 and Bay 6 of the facility building. The unit consisted of a five foot wide by 93 foot long asphalt pad designed to store 55-gallon drums of hazardous waste received from off-site generators. The unit operated under RCRA Interim Status. Drums of waste were permitted to be stored at the unit for greater than 90 days prior to being transported off-site (References 2, 6, 10 and 14).

The unit ceased operation in September 1984. RCRA closure activities were conducted at the unit in 1987 per a MADEQE approved closure plan. Closure activities included steam cleaning the asphaltic surface, collecting the rinse water, and disposing of the rinse water at a permitted treatment, recycling, and/or disposal facility. Available references did not indicate whether the closure activities conducted at AOC 2 were certified by a professional engineer or certified/ approved by MADEQE and/or U.S. EPA Region 1 (References 14, 16 and 19).

AOC Start-Up Date:

The unit began operation in 1981 (Reference 14).

AOC Closure Date:

The unit ceased operation in 1984. RCRA closure activities were completed at the unit in 1987 (References 14, 16 and 19).

Waste Managed at AOC:

The unit managed waste solvents, metal hydroxide sludge, flammable wastes, still bottoms, water soluble coolant, pesticides, corrosive wastes, waste oil, cyanide solutions and paint wastes (References 2 and 14).

Release Controls:

The unit had an asphalt base. Available references did not indicate any other release controls associated with the unit (Reference 14).

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Release History:

Available file materials did not indicate that any releases had occurred at the unit. However, available references did not indicate whether confirmatory soil sampling was conducted during RCRA closure activities at the unit.

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AOC Number: 3

AOC Name: South Drum Storage Area

AOC Status: Low potential for release

AOC Description:

The unit was located on the north side of the facility adjacent to Bay 5 of the facility building. The unit consisted of a five foot wide by 50 foot long asphalt pad with a four-inch high asphalt berm. The unit was designed to store 55-gallon drums of hazardous waste which were received from off-site generators. The unit operated under RCRA Interim Status. Drums of waste were permitted to be stored at the unit for greater than 90 days prior to being transported off-site. A 1,000-gallon capacity Underground Storage Tank (AOC 4) is located beneath the unit area (References 2, 6, 10 and 14).

The unit ceased operation in December 1986. RCRA closure activities were conducted at the unit in 1987 per an MADEQE approved closure plan. Closure activities included steam cleaning the asphaltic surface, collecting the rinse water, and disposing of the rinse water at a permitted treatment, recycling, and/or disposal facility. Available references did not indicate whether the closure activities conducted at AOC 3 were certified by a professional engineer or certified/ approved by MADEQE and/or U.S. EPA Region 1 (References 14, 16 and 19).

AOC Start-Up Date:

The unit began operation in 1981 (Reference 14).

AOC Closure Date:

The ceased operation in 1986. RCRA closure activities were completed at the unit in 1987 (References 14, 16 and 19).

Waste Managed at AOC:

The unit managed waste solvents, metal hydroxide sludge, flammable wastes, still bottoms, water soluble coolant, pesticides, corrosive wastes, waste oil, cyanide solutions and paint wastes (References 2 and 14).

Release Controls:

The unit had an asphalt base and was surrounded by a four-inch high berm surrounding the unit. No other release controls associated with this unit were identified within the available file material. These wastes were generated from off-site facilities (Reference 14).

Release History:

Available file materials did not indicate that any releases had occurred at the unit. However, available references did not indicate whether confirmatory soil sampling was conducted during RCRA closure activities at the unit.

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AOC Number: 4

AOC Name: Underground Storage Tank

AOC Status: Low potential for release

AOC Description:

The unit is located beneath the South Drum Storage Area (AOC 3) on the north side of the facility adjacent to Bay 5 of the facility building. The unit consists of a 1,000-gallon underground storage tank used to collect waste oil generated by servicing the facility's truck fleet. Available references did not indicate the unit's materials of construction. The unit stored waste oil prior to the oil being pumped out of the tank and transported to an off-site licensed facility. Available references indicate that the unit may occasionally have stored waste oil for greater than 90 days. Available references indicate that since 1991, waste oil from the unit has been used as fuel in the Space Heater (AOC 9) (References 2, 6, 10, 14, 28 and 31).

AOC Start-Up Date:

The unit began operation in 1973 (Reference 14).

AOC Closure Date:

The unit is presently operating.

Waste Managed at AOC:

The unit manages waste oil (Reference 14).

Release Controls:

The unit is located underground. The unit is taken out-of-service once a month to be checked for leaks by measuring the difference in the levels of waste oil over a 24-hour period of time. Available references did not indicate any other release controls associated with the unit (References 13 and 14).

Release History:

Available file materials did not indicate that any releases have occurred at the unit.

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AOC Number: 5

AOC Name: East Drum Storage Area

AOC Status: Release has occurred

AOC Description:

The unit was located outdoors over soil near the east boundary of the facility adjacent to the Tank Farm Area (AOC 1). Available references did not indicate the dimensions of the unit. The unit was designed to store 55-gallon drums of hazardous waste which were received from off-site generators. The unit operated under RCRA Interim Status. Drums of waste were permitted to be stored at the unit for greater than 90 days prior to being transported off-site (References 16, 19, and 30).

The unit ceased operation in December 1986. RCRA closure activities were conducted at the unit per an MADEQE approved closure plan. Soil sampling conducted at the unit indicated halogenated organic contamination in the upper one foot of soil. Closure activities included excavation of the contaminated soil and backfilling of the excavated area. Closure activities at the unit were completed in May 1993. However, available references did not indicate whether the closure activities conducted at AOC 5 were certified by a professional engineer or certified/ approved by MADEQE and/or U.S. EPA Region 1 (References 19 and 30).

AOC Start-Up Date:

Available references did not indicate the start-up date for the unit.

AOC Closure Date:

The unit ceased operation in 1986. RCRA closure activities were completed at the unit in 1993 (References 19 and 30).

Waste Managed at AOC:

The unit managed waste solvents, metal hydroxide sludge, flammable wastes, still bottoms, water soluble coolant, pesticides, corrosive wastes, waste oil, cyanide solutions and paint wastes (Reference 16).

Release Controls:

The unit had an earthen base. Available references did not indicate any other release controls associated with the unit (Reference 16).

Release History:

Analysis of soil samples collected at the unit during RCRA closure activities indicated the presence of halogenated organic compounds within the upper one foot of soil. No halogenated compounds were detected in samples collected at depths between one and two feet. As a result, the upper one foot of soil from the unit area was excavated and disposed as hazardous waste. Confirmatory samples were collected and reportedly indicated no further contamination at the unit (References 19 and 30).

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AOC Number: 6

AOC Name: Garage Drum Storage Area

AOC Status: Low potential for release

AOC Description:

The unit was located within Bay 2 of the facility building. The unit consisted of an eight foot wide by 40 foot long concrete pad with an eight-inch high concrete berm. The unit was designed to store 55-gallon drums of hazardous waste received from off-site generators. The unit operated under RCRA Interim Status. Drums of waste were permitted to be stored at the unit for greater than 90 days prior to being transported off-site (References 2, 6, 10 and 14).

The unit ceased operation in December 1986. RCRA closure activities were conducted at the unit in 1987 per an MADEQE approved closure plan. Closure activities included steam cleaning the asphaltic surface, collecting the rinse water, and disposing of the rinse water at a permitted treatment, recycling, and/or disposal facility. Available references did not indicate whether the closure activities conducted at AOC 6 were certified by a professional engineer or certified/ approved by MADEQE and/or U.S. EPA Region 1 (References 14, 16 and 19).

AOC Start-Up Date:

The unit began operation in 1984 (Reference 14).

AOC Closure Date:

The ceased operation in 1986. RCRA closure activities were completed at the unit in 1987 (References 14, 16 and 19).

Waste Managed at AOC:

The unit managed waste solvents, metal hydroxide sludge, flammable wastes, still bottoms, water soluble coolant, pesticides, corrosive wastes, waste oil, cyanide solutions and paint wastes (References 2 and 14).

Release Controls:

The unit was enclosed within Bay 2 of the facility building. The unit had a concrete floor with an eight-inch high concrete berm (Reference 14).

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Release History:

Available file materials did not indicate that any releases had occurred at the unit. However, available references did not indicate whether confirmatory soil sampling was conducted during RCRA closure activities at the unit.

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AOC Number: 7

AOC Name: Drum Loading Area

AOC Status: Low potential for release

AOC Description:

The unit was located on the northeast side of the facility. The unit was used to temporarily manage 55-gallon drums of hazardous waste during truck loading and unloading operations. Available references did not indicate the dimensions of the unit or the operating procedures for the unit (Reference 14).

AOC Start-Up Date:

The unit began operation in 1981 (Reference 14).

AOC Closure Date:

The unit ceased operation in 1986 (Reference 14).

Waste Managed at AOC:

The unit managed waste solvents, metal hydroxide sludge, flammable wastes, still bottoms, water soluble coolant, pesticides, corrosive wastes, waste oil, cyanide solutions and paint wastes (Reference 14).

Release Controls:

The unit had an asphalt base. Available references did not indicate any other release controls associated with the unit (Reference 14).

Release History:

Available file materials did not indicate that any releases have occurred at the unit.

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AOC Number: 8

AOC Name: Former Storage Area

AOC Status: Low potential for release

AOC Description:

The unit was located on an asphalt pad on the south side of the facility where Bay 4 of the facility building is presently located. The unit consisted of two 3,000 gallon capacity tanks and one roll-off box with a capacity of 1,925 gallons. Available references did not indicate the materials of construction of the tanks and the roll-off box. The two 3,000 gallon capacity tanks were used to store industrial waste oils, crankcase oils, water soluble coolant, and oil contaminated rinses. The roll-off box was used to store solvents and metal hydroxide sludges. All of the wastes generated were received from off-site facilities. The tanks and roll-off box were removed in 1981. The asphalt pavement underneath the tanks and roll-off box was excavated to allow for the construction of the Bay 4 portion of the building. Available references did not indicate the final disposition of the tanks, roll-off box, asphalt and soil from underneath the asphalt (Reference 14).

AOC Start-Up Date:

The unit began operation in 1976 (Reference 14).

AOC Closure Date:

The unit ceased operation in 1981 (Reference 14).

Waste Managed at AOC:

The unit managed industrial waste oils, crankcase oils, water soluble coolant, oil contaminated rinses, solvents and metal hydroxide sludges (Reference 14).

Release Controls:

The tanks and roll-off were located on an asphalt surface. Available references did not indicate any other release controls associated with the unit (Reference 14).

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Release History:

Available file materials did not indicate that any releases have occurred at the unit.

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AOC Number: 9

AOC Name: Space Heater

AOC Status: Low potential for release

AOC Description:

The unit consists of a Clean-Burn CB-86-AH waste oil space heater. The unit is permitted by the MADEP to burn no more than 2,000 gallons of waste oil per year. Commercial Disposal burns waste oil accumulated in the Underground Storage Tank (AOC 4) from the serving of its truck fleet (References 25, 26, 27, 28, and 31).

AOC Start-Up Date:

The unit began operation in January 1991 (Reference 25).

AOC Closure Date:

The unit is presently operating.

Waste Managed at AOC:

The unit burns crankcase oil, hydraulic or brake fluid, and transmission fluid (Reference 25).

Release Controls:

Available references did not indicate any release controls associated with the unit.

Release History:

Available file materials did not indicate that any releases have occurred at the unit. Available references did not indicate whether any air emission monitoring had been conducted for the unit.

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ANNOTATED BIBLIOGRAPHY

1. RCRA Inspection Checklist. Prepared by Robar, Massachusetts Department of Environmental Quality Engineering (MADEQE). January 7, 1982.

   Deficiencies were noted concerning the facility's Training Plan, Contingency Plan, and inspection records.

2. RCRA Industrial Survey Report. Prepared by Peter Mokrzecky and Angelo Iantosca, MADEQE. May 22, 1984.

   Violations noted by the joint U.S. EPA Region 1 and MADEQE inspection team included the lack of a waste analysis plan, no training plan, inadequate contingency plan, inadequate inspection requirements, inadequate closure plan, inadequate container management, and inadequate operating records.

3. Hazardous Waste Facility Operating Record for Commercial Disposal. Prepared by HRP Associates, Inc. July 1984.

   Provides an outline and description of the required management and inspections of hazardous waste operations conducted at the facility. Provides references for more complete and specific information concerning hazardous waste operations conducted at the facility.

4. Letter to Richard E. Gagnon, Commercial Disposal, from Merrill S. Hohman, U.S. EPA Region 1. August 28, 1984.

   Complaint, Compliance Order, and Notice of Opportunity for Hearing issued to the facility as a result of the RCRA inspections conducted on May 22, 1984.

5. Letter to Richard E. Gagnon, Commercial Disposal, from MADEQE. October 30, 1984.

   Notice of Violation issued to the facility for violations noted during the RCRA inspection conducted on October 17, 1984. Violations noted during the inspection included inadequate training records, inadequate operating records, inadequate inspection requirements, and violations of the facility's RCRA Part A permit.

6. RCRA Industrial Survey Report. Prepared by Mary Jane O'Donnell, U.S. EPA Region 1. December 12, 1984.

   Violations noted during the joint U.S. EPA Region 1 and MADEQE inspection team included inadequate waste analysis, waste storage without a permit, incomplete training records, incomplete inspection logs, and inadequate operating records.

7. Letter to Richard E. Gagnon, Commercial Disposal, from Stephen F. Joyce, MADEQE. December 27, 1984.

   Notice of Violation (NOV) issued to the facility for violations noted during a RCRA inspection conducted on December 12, 1984. Violations noted during the inspection included inadequate waste analysis, waste storage without a permit, incomplete training records, incomplete inspection logs, and inadequate operating records.

8. Letter to William F. Cass, MADEQE from Mark C. Possidento, HRP Associates, Inc. January 14, 1985.

   Provides a revised RCRA Part B Permit Application for AOCs 1, 2, 3, 5 and 6.

9. Amended Complaint, Compliance Order, and Notice of Opportunity for Hearing. Prepared by Michael R. Deland, U.S. EPA Region 1. February 28, 1985.

   Amended Complaint, Compliance Order, and Notice of Opportunity for Hearing issued to the facility as a result of RCRA inspections conducted on May 22, 1984 and December 12, 1984.

10. RCRA Industrial Survey Report. Prepared by Mary Jane O'Donnell, U.S. EPA Region 1. March 1, 1985.

    Violations noted during the joint U.S. EPA Region 1 and MADEQE inspection included storing wastes not indicated on the RCRA Part A permit, failure to comply with UST standards, and general management standard deficiencies as required by the MADEQE.

11. RCRA Facility Inspection Memorandum. Prepared by Craig Coff, MADEQE. March 1, 1985.

    Field memorandum summarizing the results of the RCRA inspection conducted on March 1, 1985. The inspection was a follow-up to the NOV issued on December 27, 1984.

12. Letter to Richard E. Gagnon, Commercial Disposal, from Stephen F. Joyce, MADEQE. March 5, 1985.

    NOV issued to the facility for violations noted during RCRA inspection conducted on March 1, 1985.

13. RCRA Facility Inspection Memorandum. Prepared by Craig Goff, MADEQE. April 30, 1985.

    Follow-up RCRA inspection to verify compliance with the NOV issued to the facility on March 5, 1985. The inspector found the facility to be in compliance with all violations cited in the March 5, 1985 NOV.

14. Letter to Robin Lind, U.S. EPA Region 1, from Larry G. Stone, Commercial Disposal. June 11, 1985.

    Provides information concerning the facility's solid waste management units. Provides a map indicating the locations of the facility's solid waste management units and a description of solid waste management units operated by the facility.

15. Memorandum to Gary B. Gosbee, U.S. EPA Region 1, from Mary Jane O'Donnell, U.S. EPA Region 1. November 1, 1985.

    Describes information received from the facility regarding the facility's solid waste management units.

16. RCRA Compliance Evaluation Inspection Report. Prepared by Craig Coff, MADEQE. April 17, 1987.

    Provides RCRA Compliance Evaluation Inspection checklists and summary report for the April 17, 1987 inspection. Violations noted during the inspection include failure to keep hazardous waste containers closed and failure to label containers with date of accumulation.

17. RCRA Facility Inspection Memorandum. Prepared by Craig Coff, MADEQE. May 14, 1987.

    Follow-up RCRA inspection to check for compliance with a Notice of Noncompliance issued to the facility on May 2, 1987. The inspector found the facility to be in compliance with all violations cited in the Notice of Noncompliance.

18. Letter to Richard E. Gagnon, Commercial Disposal, from Stephen F. Joyce, MADEQE. May 15, 1987.

    Summarizes the follow-up RCRA inspection conducted on May 14, 1987. The facility was determined to be in compliance with all violations cited in the Notice of Noncompliance issued on May 2, 1987.

19. Letter to Richard E. Gagnon, Commercial Disposal, from Stephen F. Joyce, MADEQE. June 11, 1987.

    Approves the implementation of the facility's closure plan as revised on April 2, 1987. Describes the proposed closure methods to be used by the facility to close all of its solid waste management units.

20. RCRA Facility Inspection Memorandum. Prepared by Craig Goff, MADEQE. August 13, 1987.

    Summarizes August 13, 1987 RCRA facility inspection to verify closure activities being conducted at the facility. The closure activities included emptying, washing, and collecting a rinseate sample at the Garage Drum Storage Area (AOC 6). Oil storage tanks from the Tank Farm Area (AOC 1) were in the process of being cleaned.

21. RCRA Facility Inspection Memorandum. Prepared by Craig Goff, MADEQE. August 19, 1987.

    Summarizes August 14, 1987 RCRA facility inspection to verify closure activities being conducted at the facility. Soil had been removed from the Tank Farm Area (AOC 1) and placed on polyethylene sheeting.

22. RCRA Facility Inspection Memorandum. Prepared by Craig Goff, MADEQE. August 19, 1987.

    Summarizes August 18, 1987 RCRA facility inspection to verify closure activities being conducted at the facility. No closure activities were being performed at the time of the inspection.

23. RCRA Facility Inspection Memorandum. Prepared by Craig Goff, MADEQE. August 28, 1987.

    RCRA facility inspection to verify closure activities being conducted at the facility. Additional excavation of the Tank Farm Area (AOC 1) had occurred. It was determined that the entire paved areas in the vicinities of AOCs 2 and 3 should be cleaned because of the slope of the pavement.

24. Letter to Richard E. Gagnon, Commercial Disposal Company, Inc. from Stephen F. Joyce, MADEQE. October 9, 1987.

    Describes the analytical results for the soil removed from the Tank Storage Area (AOC 1). Indicates that residual contamination exists, but that it is representative of background levels.

25. Registration Form for a Space Heater Used to Burn Waste Oil for Energy Recovery. Prepared by Richard Gagnon, Commercial Disposal. January 17, 1991.

    Indicated that the Space Heater (AOC 9) would burn crankcase oil, hydraulic or brake fluid, and transmission fluid.

26. Letter to Donald Faucher, Commercial Disposal, from David E. Howard, MADEQE. March 6, 1991.

    Class A Recycling Permit issued to the facility for the burning of waste oil.

27. RCRA Facility Inspection Field Memorandum. Prepared by J. Nikodem, MADEQE. June 17, 1991.

    Summarizes the results of the June 17, 1991 RCRA inspection of the facility. No violations were noted during the inspection.

28. 1991 Annual Report for Recyclers. Prepared by Commercial Disposal. January 23, 1992.

    Indicates that the facility recycled 1,650 gallons of waste oil in 1991.

29. Massachusetts Department of Environmental Protection (MADEP) Oil and Hazardous Material Incident Report. Prepared by Cynthia Carpenter, MADEP. December 1, 1992.

    During refueling of a vehicle, the pump nozzle fell out of the tank and spilled approximately 30 gallons of diesel fuel on asphalt pavement. Absorbent material was used to clean up the spill. The absorbent material was drummed and transported off-site.

30. RCRA Compliance Evaluation Inspection Report. Prepared by John Downes, MADEQE. May 24, 1993.

    RCRA Compliance Evaluation Inspection checklists and attached summary report for May 24, 1993 inspection. No violations were noted during the inspection.

31. 1993 Annual Report for Recyclers. Prepared by Commercial Disposal Company, Inc. February 2, 1994.

    Indicates that the facility recycled 1,690 gallons of waste oil in 1993.

32. RCRA Compliance Evaluation Inspection Report. Prepared by J. Nikodem, MADEP. September 22, 1994.

    RCRA Compliance Evaluation Inspection checklists for September 22, 1994 inspection. No violations were noted during the inspection.

33. RCRIS Database Printout for Commercial Disposal, West Springfield, Massachusetts. Prepared by U.S. EPA Region 1. October 11, 1994.

    Provides listing of site inspections conducted since 1984. Lists inspections and any violations noted.

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Timeline of EPA and State Agency Site Visits

Date of Visit	Participants	Purpose	Outcome/References
1/7/82	Robar, MADEQE	RCRA Facility Inspection	Violations of the training plan, contingency plan, and site inspection requirements were noted (Reference 1).
3/23/84	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA Compliance Evaluation Inspection (CEI)	Minor deficiencies were noted in the facility's manifests. Available references did not indicate the follow-up to the deficiencies (Reference 33).
5/22/84	M. O'Donnell, U.S. EPA Region 1 G. Ruta, U.S. EPA Region 1 P. Mokrzecky, MADEQE A. Iantosca, MADEQE E. Johnson, MADEQE A. Walker, MADEQE	RCRA CEI and Compliance Schedule Evaluation (CSE)	Four Class 1 and three Class 2 violations were noted concerning the lack of a waste analysis plan, no training plan, inadequate contingency plan, inadequate inspection requirements, inadequate closure plan, inadequate container management, and inadequate operating records. On 8/28/94 the U.S. EPA Region 1 issued an Initial 3008(A) Compliance Order to the facility concerning the violations. The facility achieved compliance with the Order on 4/30/85. A Final 3008(A) Compliance Order imposing a $46,075 fine was issued by U.S. EPA Region 1 on 7/16/85 (References 2, 4 and 33).

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Timeline of EPA and State Agency Site Visits

Date of Visit	Participants	Purpose	Outcome/References
6/20/84	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA CEI and CSE	Three Class 1 and one Class 2 violations were noted concerning RCRA closure and financial requirements and "other" TSD requirements. The facility achieved compliance with the violations on 4/30/85 (Reference 33).
7/17/84	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA Financial Record Review	One Class 1 violation was noted concerning RCRA financial requirements. The facility achieved compliance with the violation on 4/30/85 (Reference 33).
10/1/84	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA Non-Financial Record Review	No violations noted (Reference 33).
10/17/84	C. Goff, MADEQE	RCRA CSE	Two Class 1 and two Class 2 violations were noted concerning inadequate training records, inadequate operating records, inadequate inspection requirements, and violations of the facility's RCRA Part A Permit Application. The MADEQE issued a NOV to the facility on 10/30/84. The facility achieved compliance with the violations on 4/30/85 (References 5 and 33).

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Timeline of EPA and State Agency Site Visits

Date of Visit	Participants	Purpose	Outcome/References
12/12/84	M. O'Donnell, U.S. EPA Region 1 C. Goff, MADEQE	RCRA CEI	One Class 1 and one Class 2 violations were noted concerning inadequate waste analysis, storing wastes not indicated on the RCRA Part A Permit Application, incomplete training records, incomplete inspection logs, and inadequate operating records. The MADEQE issued a NOV to the facility on 12/27/84. The U.S. EPA Region 1 issued an Amended Complaint, Compliance Order, and Notice of Opportunity for Hearing to the facility on 2/28/85. The facility achieved compliance with the violations on 4/30/85 (References 6, 7, 9 and 33).
3/1/85	M. O'Donnell, U.S. EPA Region 1 C. Goff, MADEQE	RCRA CEI	One Class 1 and one Class 2 violation were noted concerning storage of wastes not indicated on the RCRA Part A Permit Application, failure to comply with UST standards, and general management standards as required by the MADEQE. The MADEQE issued a NOV to the facility on 3/5/85. The facility achieved compliance with the violations on 4/30/85 (References 10, 12 and 33).
4/30/85	C. Goff, MADEQE	RCRA CSE	No violations noted (References 13 and 33).

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Timeline of EPA and State Agency Site Visits

Date of Visit	Participants	Purpose	Outcome/References
12/10/85	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA Financial Record Review	One Class 1 violation was noted concerning financial responsibility requirements. The facility achieved compliance with the violation on 4/30/86 (Reference 33).
4/30/86	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA CSE	No violations noted (Reference 33).
5/23/86	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA CEI	No violations noted (Reference 33).
4/17/87	C. Goff, MADEQE	RCRA CEI	One Class 2 violation was noted concerning failure to keep hazardous waste containers closed and failure to label a container with the date of accumulation. The MADEQE issued a Notice of Non-Compliance (NON) to the facility on 5/2/87. The facility achieved compliance with the violation on 5/14/87 (References 16, 18 and 33).
5/14/87	C. Goff, MADEQE	RCRA CSE	No violations noted (References 17 and 33).

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Timeline of EPA and State Agency Site Visits

Date of Visit	Participants	Purpose	Outcome/References
8/13/87	C. Goff, MADEQE	RCRA Closure Inspection	The Garage Drum Storage Area (AOC 6) had been emptied and washed. A rinseate sample was collected. Oil storage tanks at AOC 1 were in the process of being cleaned (Reference 20).
8/14/87	C. Goff, MADEQE	RCRA Closure Inspection	Oil storage tanks at AOC 1 were still being cleaned. Soil had been removed from the tank farm area and placed on polyethylene sheeting (Reference 21).
8/18/87	C. Goff, MADEQE	RCRA Closure Inspection	The oil storage tanks at AOC 1 had been cleaned and were awaiting final disposition. Removed soil was still located at the site and was covered with polyethylene sheeting (Reference 22).
8/28/87	C. Goff, MADEQE	RCRA Closure Inspection	Additional excavation of the area at AOC 1 had occurred. It was determined that the entire paved area in the vicinity of AOCs 2 and 3 should be cleaned because of the slope of the pavement (Reference 23).
9/27/89	W.E., MADEQE (available references only indicated the initials of the participant)	RCRA CEI	No violations noted (Reference 33).

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Timeline of EPA and State Agency Site Visits

Date of Visit	Participants	Purpose	Outcome/References
6/17/91	J. Nikodem, MADEQE	RCRA CEI	No violations noted (References 27 and 33).
5/24/93	J. Downes, MADEP	RCRA CEI	No violations noted (References 30 and 33).
9/22/94	J. Nikodem, MADEP	RCRA CEI	No violations noted (Reference 32).